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Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Reply and Opposition to Petition for Reconsideration (PS Docket
Nos. 15-91 and 15-94)

Dear Secretary Dortch:

The National Center for Missing & Exploited Children (NCMEC) submits the following information in support of continued improvements to the Wireless Emergency Alert system and in opposition to the recent CTIA Petition for Reconsideration.¹

To date 857 abducted children have been safely returned to their families specifically as a result of the AMBER Alert Program. Since the inception of Wireless Emergency Alerts, NCMEC has issued more than 300 Wireless Emergency Alert activations on behalf of AMBER Coordinators. These Alerts serve to galvanize the entire community to search for children in life-threatening danger.²

NCMEC has provided more than a decade of operational support for the AMBER Alert program. Likewise, NCMEC has joined colleagues in the non-profit, private, and public sectors for several years to provide insight and suggestions for improving the effectiveness of WEA messages towards the goal of finding abducted children quickly and safely.

Embedded References

The Commission's *Order* in this proceeding contained a number of short and long-term improvements to the WEA system and message content that NCMEC anticipates would have a positive impact on

¹ Petition for Reconsideration of CTIA, Dec. 1, 2016, PS Docket Nos. 15-91 and 15-94 ("*CTIA Petition*").

² Recent AMBER Alert success stories are catalogued on NCMEC's website at www.missingkids.org/AMBER/success. These include descriptions of several cases in which the WEA message itself is specifically credited for the safe return of an abducted child.

future AMBER Alerts, and would lead to the safe return of additional children.³ It remains NCMEC's position that including an embedded URL address directing message recipients to an AMBER Alert website may be the most important potential enhancement at this time. This requirement for including embedded URLs should not be rescinded nor implementation delayed. With support based on numerous filings the Commission correctly recognized that "the availability of URLs could transform the scope of WEA from a character-limited text message service" to a much more robust resource.⁴

In further support, NCMEC reiterates that the limited data size (approximately 15KB) of a typical AMBER Alert webpage should not impact network congestion even if a very large volume of recipients visit the page at the same time. An embedded URL can provide up-to-date information about a missing child scenario and also inform the public of the cancellation when an AMBER Alert has ended, regardless of how slowly the recipient might click on or visit the URL, and without sending additional WEA messages across carrier networks. The Commission already addressed the benefits embedded URLs can have towards reducing "milling" behavior.⁵ NCMEC reiterates this benefit also applies to AMBER Alert messages, where WEA recipients could be guided to a specially-designed web page to learn more information in a manner that minimizes the use of data and network resources.⁶

The CTIA Petition for Reconsideration raises concerns regarding "congestion and consequent failure of websites" that exceed anticipated concerns of possible network congestion a wireless carrier might face.⁷ NCMEC currently manages a website that displays photos and information about every active AMBER Alert in the United States, and which receives a high volume of traffic (often in a short time span) when a new alert is issued.⁸ Because of this and other relevant experience, NCMEC already supports deploying webpage content, including photographs of missing children and other information that would be the target of a URL link, on content distribution networks (CDNs). A CDN is a global network of servers designed specifically to perform well in high-demand (large number of users) scenarios, with high performance and high availability, as well as the capability to scale immediately and transparently to meet demand. CDN capabilities are well-documented and proven and already in use for NCMEC resources today.

The CTIA Petition for Reconsideration also argues that the current compliance deadline for implementing embedded references should be deferred.⁹ NCMEC was pleased to participate in an earlier productive meeting with a CTIA carrier member company (AT&T) about embedding URLs in WEA-based AMBER Alert messages and would encourage all CTIA members to take a similar constructive approach to enhancing messages with URLs in a manner that can best help find missing

³ *Wireless Emergency Alerts; Amendments to Part 11 of the Commission's Rules Regarding the Emergency Alert System*, PS Docket Nos. 15-91 and 15-94, Report and Order and Further Notice of Proposed Rulemaking, FCC 16-127 (Sept. 29, 2016) ("Order").

⁴ *Id.* ¶ 27.

⁵ *Id.* ¶ 30.

⁶ For example, current WEA message limitations often necessitate AMBER Alert broadcasts that encourage recipients to "check local media" and frequently lead recipients to search the internet for additional details rather than directing them to a single destination.

⁷ *CTIA Petition* at 4-5.

⁸ This web page (www.missingkids.org/AMBER) was specifically discussed by the Commission. *Order* ¶ 33.

⁹ *CTIA Petition* Section II.


children.¹⁰ NCMEC is committed to future collaboration with carriers and/or manufacturers, to best improve messages while limiting the impact on networks, but NCMEC does not support delaying or deferring the current compliance deadline.

Phone Numbers and “Clickable” Links

The CTIA Petition for Reconsideration also argues that the requirement to support “clickable” phone numbers in WEA messages, lacks adequate definition and necessitates delay in order for providers to properly understand and implement.¹¹ NCMEC does not believe the term “clickable” requires any further explanation or clarification and should not form the basis for delaying the compliance requirement. Several years ago NCMEC participated in the CSRIC IV Working Group 2, alongside representatives from CTIA, ATIS, multiple wireless carriers, and other stakeholders. The working group was tasked with recommending improvements for WEA messages without harming the networks of voluntary wireless carrier participants. Since at least as early as 2014, when the working group released its final report, and likely much earlier, there has been no confusion regarding the continuous and common use of the term “clickable” with respect to URLs or phone numbers in WEA messages.¹² NCMEC continues to support the conclusion of that working group, which recommended immediately allowing an embedded phone number for WEA-based AMBER Alert messages,¹³ and NCMEC does not support any delay or deferral of the Commission’s compliance deadline for including a “clickable” phone number now.

The National Center for Missing & Exploited Children urges the Commission and all valued partners in the public and private sectors to continue moving *forward* to improve the WEA system, enhance AMBER Alert messages, and protect our nation’s children.

Respectfully submitted,

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Michelle C. DeLaune
 Senior Vice President, Chief Operating Officer
 National Center for Missing & Exploited Children

¹⁰ See Letter from William L. Roughton, Jr., AT&T Services, Inc. to Marlene Dortch, Secretary, Federal Communications Commission, PS Docket No. 15-91 (filed May 23, 2016) and Letter from Preston Findlay, National Center for Missing & Exploited Children to Marlene Dortch, Secretary, Federal Communications Commission PS Docket No. 15-91 (filed May 24, 2016).

¹¹ *CTIA Petition* at 8-9.

¹² See CSRIC IV, Working Group 2, Wireless Emergency Alerts *Final Report* (2014) which contains more than twenty separate uses of the term “clickable” during discussions, user-activity descriptions, and final report recommendations relevant to embedded URLs and phone numbers in WEA messages.

¹³ *Id.* at 46 (“Recommendation 4.6: It is further recommended that 47 CFR 10 § 10.440 Embedded Reference Prohibition does not apply for the inclusion of an embedded telephone number for AMBER Alerts.”).